

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA §  
§  
v. § No. 4:13CR233  
§ Judge Schell  
ASHLEY WOODS (3) §

**ELEMENTS OF THE OFFENSE**

Defendant **Ashley Woods** is charged in Count One of the Information with a violation of 18 U.S.C. § 371 (Conspiracy to Commit Bank Fraud). The elements of the offense are as follows:

**18 U.S.C. § 371**

1. That the defendant and at least one other person made an agreement to commit the crime of bank fraud as charged in the Information;
2. That the defendant knew the unlawful purpose of the agreement and joined in it willfully, that is, with the intent to further the unlawful purpose; and
3. That one of the conspirators during the existence of the conspiracy knowingly committed at least one of the overt acts described in the Information, in order to accomplish some object or purpose of the conspiracy.

**18 U.S.C. § 1344**

1. That the defendant knowingly executed a scheme or plan to obtain money or property from a Financial Institution by means of false or fraudulent pretenses, representations, or promises;
2. That the defendant acted with specific intent to defraud a Financial Institution;
3. That the false pretenses, representations, or promises made were material;
4. That the defendant placed the Financial Institution at risk of civil liability or financial loss; and
5. That the Financial Institution was insured by the Federal Deposit Insurance Corporation.

Respectfully Submitted,

JOHN M. BALES  
United States Attorney

/s/ Camelia Lopez

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**CERTIFICATE OF SERVICE**

I certify that a copy of this document was served by electronic filing to counsel for defense,  
David Haynes.

Dated: March 12<sup>th</sup>, 2014

/s/ Camelia Lopez  
Camelia Lopez